

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GRISSELLE RAMOS, on behalf of herself and all others similarly situated,	)	
	)	
Plaintiff,	)	No. 08 CV 2703
	)	
v.	)	Judge Lefkow
	)	
	)	Magistrate Judge Schenkier
PLAYTEX PRODUCTS, INC., RC2	)	
CORPORATION, LEARNING CURVE	)	
BRANDS, INC., and MEDELA, INC.,	)	
	)	
Defendants.	)	
DINA SCALIA, JENNIFER SUAREZ and	)	
MARISSA LOPEZ, on behalf of herself and	)	
all others similarly situated,	)	
	)	No. 08 CV 2828
Plaintiff,	)	
	)	Judge Lefkow
v.	)	
	)	Magistrate Judge Schenkier
PLAYTEX PRODUCTS, INC., RC2	)	
CORPORATION, LEARNING CURVE	)	
BRANDS, INC., and MEDELA, INC.,	)	
	)	
Defendants.	)	
JESSICA SMITH, on behalf of herself and	)	
all others similarly situated,	)	
	)	No. 08 CV 3352
Plaintiff,	)	
	)	Judge Lefkow
v.	)	
	)	Magistrate Judge Schenkier
PLAYTEX PRODUCTS, INC., RC2	)	
CORPORATION, LEARNING CURVE	)	
BRANDS, INC., and MEDELA, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS RC2 CORPORATION'S AND LEARNING CURVE BRANDS, INC.'S  
RESPONSE IN SUPPORT OF DEFENDANT MEDELA, INC.'S MOTION FOR ENTRY  
OF A CASE MANAGEMENT ORDER PURSUANT TO RULE 16(C)(12)**

Defendants RC2 Corporation<sup>1</sup> and Learning Curve Brands, Inc. hereby notify the Court that they support and join in Defendant Medela, Inc.'s Motion for Entry of a Case Management Order ("Medela's Motion for CMO").

Medela's Motion for a CMO is consistent with the Motions to Dismiss filed by RC2 and Learning Curve as they all raise issues related to each Plaintiff's failure to state with specificity which of the three products (VPBPs) Plaintiffs have purchased.

RC2 and Learning Curve agree that Plaintiffs should be required to produce the information sought by Medela's Motion prior to the commencement of discovery in this case. Further, if the Court should grant the pending motions to sever claims against the Defendants, RC2 and Learning Curve would request the Court's order be made applicable to all severed claims against them.

Respectfully submitted,

RC2 CORPORATION<sup>2</sup> and  
LEARNING CURVE BRANDS, INC.

s/ Bart T. Murphy  
By one of their attorneys

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<sup>1</sup> RC2 Corporation submits this response in the Ramos and Scalia Actions only and not in the Smith Action in which it has not been served.

<sup>2</sup> RC2 Corporation does not bring this motion in the Smith Action in which it has not been served.

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that on July 9, 2008 he caused the foregoing to be filed with the Clerk of the United States District Court for the Northern District of Illinois and a copy of which will be served on the counsel listed below by the Clerk's ECF/CM system:

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s/ Bart T. Murphy

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